

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION, Plaintiff, v. NAUMAN A. ALY, Defendant.	16 Civ. 3853 (PGG) MOTION FOR PROTECTIVE ORDER
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MOTION FOR PROTECTIVE ORDER

Defendant Nauman A. Aly respectfully begs and moves the esteemed Court for an Order directing that a deposition heretofore set by the Commission's Notice Of Deposition (Aly Decl. ¶ 5) to occur on Monday, January 9, 2017 at the Commission's offices in the Southern District of New York **takes place** in Karachi instead. As grounds therefore, the Defendant would respectfully state as follows:

Mr. Aly currently lives in Karachi, Pakistan. (Id. ¶ 1). Mr. Aly has remained *pro se* in this matter from the beginning with no counsel whatsoever. (Id. ¶ 2). Mr. Aly currently has no financial means to travel outside Karachi. (Id. ¶ 3). Mr. Aly, therefore, respectfully requests the opportunity to offer an alternative regarding the location of his proposed deposition, which has been currently noticed by the Commission to occur in New York on January 9, 2017, which would be to conduct the deposition in Karachi instead. Mr. Aly has informed the Commission that it can conduct the deposition in-person or through video conferencing at the U.S. Consulate in Karachi, or a Major Hotel in Karachi, or a Major Local Law Firm in Karachi. (Id. ¶ 5).

The U.S. Consulate in Karachi is the United States' largest Consulate General, and is larger, in terms of both personnel and facilities, than many U.S. Embassies. The Karachi CG operates with a significant degree of autonomy when compared to other U.S. Consulates. This is due in part to several large U.S. government regional centers housed within the Consulate, which provide support in the areas of security, construction, and financial matters to a number of other U.S Diplomatic posts located throughout Asia. (Source: U.S. Consulate in Karachi's Wikipedia page) (Id. ¶ 5).

Wherefore, Mr. Aly humbly submits and respectfully requests that this motion be granted in its entirety, together with such other and further relief as the Court may deem to be necessary and proper.

Dated: December 23, 2016

Respectfully submitted,

/s/ Nauman A. Aly

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